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*Attorneys for Defendants Thomson Reuters Corporation,
Thomson Reuters Canada Limited, Thomson Reuters
Enterprise Centre GmbH, and West Publishing Corporation*

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ATLAS DATA PRIVACY	:	CIVIL ACTION
CORPORATION, et al.,	:	
	:	NO. 1:24-CV-04269
<i>Plaintiffs</i>	:	
	:	
v.	:	
	:	
THOMSON REUTERS	:	
CORPORATION, et al.,	:	
	:	
<i>Defendants</i>	:	

NOTICE OF MOTION TO DISMISS PURSUANT TO RULE 12(B)(5)

PLEASE TAKE NOTICE that pursuant to Federal Rule of Civil Procedure 12(b)(5) and in accordance with the Court's Order entered on January 22, 2025, the undersigned attorneys for Defendants Thomson Reuters Corporation, Thomson Reuters Canada Limited, Thomson Reuters Enterprise GmbH, and West Publishing

Corporation (the “Thomson Reuters Defendants”) hereby move before the Honorable Harvey Bartle III, U.S.D.J., for an Order dismissing the claims against Thomson Reuters Corporation and Thomson Reuters Canada Limited.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, the Thomson Reuters Defendants shall rely on the attached Brief.

PLEASE TAKE FURTHER NOTICE that a proposed form of Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that, in addition to this Motion, the Thomson Reuters Defendants move to dismiss the Complaint in its entirety for the reasons described in the Memorandum of Law in Support of Defendants’ Consolidated Motion to Dismiss Pursuant to Rule 12(b)(6). *See Atlas Data Privacy Corp., et al. v. DM Group Inc., et al.*, No. 24-4075 (ECF No. 59).

Dated: March 18, 2025

BALLARD SPAHR LLP

/s/ Marcel S. Pratt

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CERTIFICATE OF SERVICE

I, Marcel Pratt, hereby certify that I caused a copy of the foregoing Notice of Motion to Dismiss Pursuant to Rule 12(b)(5), as well as the accompanying Brief in Support of the Motion and Proposed Order, to be served via e-filing on March 18, 2025 to all counsel of record.

Date: March 18, 2025

/s/ Marcel S. Pratt
Marcel S. Pratt